

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

Charleston Division

*G.T., by his parents Michelle and Jamie T.
on behalf of themselves and all similarly situated
individuals, et al.,*

Plaintiffs,

v.

CIV. ACT. NO. 2:20-CV-00057
JUDGE BERGER

THE BOARD OF EDUCATION OF
THE COUNTY OF KANAWHA,

Defendant.

JOINT MOTION FOR EXTENSION OF EXPERT DISCLOSURE DEADLINES

COME NOW Plaintiffs G.T., K.M., and The Arc of West Virginia (“Plaintiffs”), by and through counsel, and Defendant the Board of Education of the County of Kanawha (“Defendant”), by counsel, and pursuant to Fed. R. Civ. P. 16(b)(4), jointly move this Court for a brief extension of expert disclosure deadlines set by the Second Amended Scheduling Order (ECF No. 183). In support thereof, the parties state as follows:

1. Plaintiffs’ experts are working against several competing deadlines in other matters. This has made it especially difficult to schedule time to meet with the named plaintiffs and their families, who are also restricted by full-time employment and child care. In light of conflicting schedules and obligations, Plaintiffs’ experts need four additional days to meet with the named plaintiffs and prepare their reports.

2. On April 16, 2025, Plaintiffs contacted Defendant’s counsel requesting Defendant agree to a four day extension to Plaintiffs’ expert disclosure deadline. In exchange, Plaintiffs agreed to stipulate to a similar extension of Defendant’s expert disclosure deadline from May 21,

2025 to May 27, 2025 and proposed the parties extend their deadline for rebuttal reports from June 18, 2025 to June 23, 2025. On April 17, 2025, Defendant informed Plaintiffs it does not object to the reciprocal four-day extension.

3. This limited extension will not implicate any other deadlines in the Second Amended Scheduling Order.

4. Accordingly, the parties respectfully request that the last day for Plaintiffs to disclose expert witnesses and the accompanying written reports be extended from April 21, 2025 to **April 25, 2025**, the last day for Defendant to disclose expert witnesses and the accompanying written reports be extended from May 21, 2025 to **May 27, 2025**, and the last day for expert disclosures intended solely to contradict or rebut evidence identified by the other party from June 18, 2025 to **June 23, 2025**.

Report	Current Deadline	Proposed Deadline
Plaintiffs' Expert Disclosures	April 21, 2025	April 25, 2025
Defendant's Expert Disclosures	May 21, 2025	May 27, 2025
Rebuttal Reports	June 18, 2025	June 23, 2025

Therefore, the parties respectfully request that the Court grant their joint motion to extend the expert disclosure deadlines in accordance with the schedule outlined above.

Respectfully submitted by:

Plaintiffs G.T., *et al.*,

By counsel:

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